



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

June 19, 2003

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

TO: Interested Parties / Applicant

RE: **MONACO COACH 039-17437-00087**

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
Administrator, Christine Todd Whitman  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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**June 19, 2003**

Kurt Anderson  
Director of EH&S  
Monaco Coach Corporation  
P.O. Box 465  
Wakarusa, Indiana 46573

Re: 039-17437-00087  
Second Minor Permit Modification to:  
Part 70 Permit No.: T039-6116-00087

Dear Mr. Anderson:

Monaco Coach Corporation was issued a permit on June 26, 2002, for a recreation vehicle manufacturing plant that operates woodworking, surface coating, and fiberglass processes. A letter requesting changes to this permit was received on March 18, 2003. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of:

1. The addition of a paint booth (identified as SB42-3) to Plant 42, which will comply with the same requirements already included in the permit for existing surface coating booths;
2. The renaming of the existing fiberglass and resin booths as SB42-1 and SB42-2;
3. Deletion of the reference to the number of HVLP guns per booth (previously included in the descriptions of the surface coating booths).
4. Correction of the description of the control device D48-02 from baghouse to cyclone.

All other conditions of the permit shall remain unchanged and in effect. The entire permit is enclosed.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Amanda Baynham, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7910 to speak directly to Ms. Baynham. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,  
**Original signed by**  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

#### Attachments

ERG/AAB

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Air Compliance Section Inspector - Paul Karkiewicz  
Northern Regional Office  
Compliance Data Section - Karen Nowak  
Administrative and Development - Sarah Cloe  
Technical Support and Modeling - Michele Boner



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## MINOR SOURCE MODIFICATION PERMIT OFFICE OF AIR QUALITY

**Monaco Coach Corporation  
1205 East Lincoln Street  
Nappanee, Indiana 46550**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6116-00087	Pages Affected:
Issued by:  Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 26, 2002  Expiration Date: June 26, 2005

First Administrative Amendment No.: 039-16234-00087, issued December 3, 2002  
First Minor Permit Modification No.: 039-16199-00087, issued April 8, 2003

Second Minor Permit Modification No.: MPM039-17437-00087	Pages Affected: 5, 6, 10, 11, 17, 19, 22, 23, 24, 26-31, 36 and 39
Issued by: <b>Original signed by</b> Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: <b>June 19, 2003</b>

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Semi-Annual Report- Wood Furniture NESHAP  
Quarterly Report  
Quarterly Report  
Quarterly Deviation and Compliance Monitoring Report

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary recreational vehicle manufacturing plant, that operates woodworking, surface coating, and fiberglass processes.

Responsible Official: Vice President  
Source Address: 1205 East Lincoln Street, Nappanee, Indiana, 46550  
Mailing Address: P.O. Box 465, Wakarusa, Indiana, 46573  
SIC Codes: 2434, 2431, 2511, 3083, 3716, 3792  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

#### (a) Surface Coating:

- (1) Five (5) paint booths, located in Plant 48, identified as B48-1 through B48-5, constructed in 1984, equipped with HVLP spray guns for wood furniture and cabinet coating, with a maximum capacity at each spray booth of five (5) gallons per hour of coating, using dry filters for overspray control, and exhausting at stacks SV48-01 for booth B48-1, SV48-02 for B48-2, SV48-03 for B48-3, SV48-04 for B48-4, and SV48-05 for B48-5.
- (2) One (1) wood finishing paint line, located in Plant 48, consisting of the following equipment:
  - (A) One (1) wood prep and clean-up area with a total maximum raw material throughput of 120 units per hour per booth; and
  - (B) Three (3) paint booths, identified as B48-6 through B48-8, constructed in 1999, equipped with HVLP guns for stain, topcoat and sealer applications, with a total maximum raw material throughput of 120 units per hour per booth, using dry filters for overspray control, and exhausting at stacks SV48-6, SV48-7 and SV48-8, respectively.
- (3) One (1) paint booth (identified as SB42-3), located in Plant 42, used in conjunction with SB42-1 and SB42-2 for coating wood cabinets using HVLP spray guns and having a maximum throughput capacity of 120 units per hour. Emissions of particulate matter are controlled using dry filters, which exhaust at stack SV42-3. This unit was constructed in 2003.

- (4) One (1) lamination spray adhesive booth, located in Plant 42, identified as lam42, using a HVLP spray gun, with a maximum capacity of 14 gallons per day of adhesive, using dry filters for overspray control, and exhausting at GV42. The lamination booth may be used for wood finishing operations using HVLP spray guns from paint booths B48-1 through B48-5.
- (b) Woodworking Operations controlled by:
  - (1) One (1) baghouse for particulate control, located in Plant 48, identified as D48-01, with a maximum capacity of 10000 pounds per hour, and exhausting at stack D48-01.
  - (2) One (1) cyclone for particulate control, located in Plant 48, identified as D48-02, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D48-02.
  - (3) One (1) cyclone for particulate control, located in Plant 42, identified as D42-01, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D42-01.
  - (4) One (1) baghouse for particulate control, located in Plant 42, identified as D42-02, controlling emissions from woodworking equipment with a maximum throughput capacity of 3,000 pounds per hour, and exhausting at stack D42-02.
  - (5) One (1) baghouse for particulate control, located in Plant 48, identified as D48-05, controlling emissions from woodworking equipment with a maximum throughput capacity of 13,000 pounds per hour, and exhausting at stack D48-05.
  - (6) One (1) baghouse for particulate control, located in Plant 48, identified as D48-03, controlling emissions from woodworking equipment with a maximum throughput capacity of 5,000 pounds per hour, and exhausting at stack D48-03.
  - (7) One (1) baghouse for particulate control, located in Plant 48, identified as D48-04, controlling emissions from woodworking equipment with a maximum throughput capacity of 3,000 pounds per hour, and exhausting at stack D48-04.
- (c) Fiberglass Operations:
  - (1) One (1) fiberglass motor home parts manufacturing line (identified as booths SB42-1 and SB42-2), consisting of one (1) fiberglass booth equipped with one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system. The fiberglass booth may be used for wood finishing operations using HVLP spray guns. The fiberglass booths (SB42-1 and SB42-2) are equipped with dry filters for overspray which exhaust to stack GV42.
  - (2) One (1) fiberglass prep and clean-up area, exhausting to stack GV42.
  - (3) One (1) sander, with dry filters for PM control, exhausting to stack GV42.
  - (4) Two (2) routers, each with dry filters for PM control, and both exhausting to stack GV42.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment, identified as W43 and T43, located in Plant 43, related to manufacturing activities not resulting in the emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Degreasing operations, located in Plant 43, identified as DG43, using mineral spirits as solvent, with a maximum throughput of 0.3 gallons per day, and exhausting at stack GV43.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V

Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.



The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.13 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted by this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2] [IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### C.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52, Subpart P]

- (a) Pursuant to 40 CFR 52, Subpart P, the particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

#### C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.7 Operation of Equipment [326 IAC 2-7-6(6)]



Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.8 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.10 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.11 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

**C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.14 Monitoring Methods [326 IAC 3][40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that will be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents

such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the

Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C -Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source;
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

(a) Surface Coating:

- (1) Five (5) paint booths, located in Plant 48, identified as B48-1 through B48-5, constructed in 1984, equipped with HVLP spray guns for wood furniture and cabinet coating, with a maximum capacity at each spray booth of five (5) gallons per hour of coating, using dry filters for overspray control, and exhausting at stacks SV48-01 for booth B48-1, SV48-02 for B48-2, SV48-03 for B48-3, SV48-04 for B48-4, and SV48-05 for B48-5. The HVLP spray guns may be used in the lamination and fiberglass booths (located in Plant 42) for wood furniture and cabinet coating.
- (2) One (1) wood finishing paint line, located in Plant 48, consisting of the following equipment:
  - (A) One (1) wood prep and clean-up area with a total maximum raw material throughput of 120 units per hour per booth; and
  - (B) Three (3) paint booths, identified as B48-6 through B48-8, to be constructed in 1999, equipped with HVLP guns for stain, topcoat and sealer applications, with a total maximum raw material throughput of 120 units per hour per booth, using dry filters for overspray control, and exhausting at stacks SV48-6, SV48-7 and SV48-8, respectively.
- (3) One (1) paint booth (identified as SB42-3), located in Plant 42, used in conjunction with SB42-1 and SB42-2 for coating wood cabinets using HVLP spray guns and having a maximum throughput capacity of 120 units per hour. Emissions of particulate matter are controlled using dry filters, which exhaust at stack SV42-3. This unit was constructed in 2003.
- (4) One (1) lamination spray adhesive booth, located in Plant 42, identified as lam42, using a HVLP spray gun, with a maximum capacity of 14 gallons per day of adhesive, using dry filters for overspray control, and exhausting at GV42. The lamination booth may be used for wood finishing operations using HVLP spray guns from paint booths B48-1 through B48-5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for B48-1 through B48-5, and SB42-3, pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, and pursuant to Administrative Amendment 039-16234-00087 for lam42 and the fiberglass booths



(SB42-1 and SB42-2) in Section D.3, the surface coatings applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P and pursuant to PC (20) 1730, issued on February 21, 1989 for B48-1 through B48-5, and pursuant to the Exemption issued on March 4, 1987, and CP 039-10442-00087, issued April 21, 1999 for B48-6 through B48-8, and pursuant to Administrative Amendment 039-16234-00087 for lam42 and the fiberglass booth in Section D.3 and pursuant to MSM 039-17357-00087 for SB42-3, the PM from each of the surface coating operations, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.4 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

For the surface coating operations, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, the provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the surface coating facilities described in this section and to the fiberglass booth described in Section D.3, except when otherwise specified in 40 CFR 63, Subpart JJ.

#### D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

For the surface coating operations performed in B48-1 through B48-5, SB42-3, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

- (a) The wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998, and the date operation commenced for B48-6 through B48-8.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

- (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids as applied; or
  - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight, as applied; or
  - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
  - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids, as applied.
  - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids, as applied.
  - (C) Or, as an alternative method to (A) and (B) of this part, use a control device to limit emissions to one (1.0) pound VHAP per pound solids, as applied.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

#### D.1.6 Work Practice Standards [40 CFR 63.803]

For the surface coating operations, performed in B48-1 through B48-5, SB42-3, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum addresses each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.

- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### **D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

For the surface coating operations B48-1 through B48-5, SB42-3, lam42, and the fiberglass booths described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, a Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### **Compliance Determination Requirements**

#### **D.1.8 Testing Requirements [ 326 IAC 2-1.1-11] [326 IAC 2-7-6(1),(6)] [40 CFR 63]**

For the surface coating operations performed in B48-1 through B48-5, SB42-3, lam42 and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 24, 1999, for B48-6 through B48-8:

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.1.1, D.1.3, and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### **D.1.9 Volatile Organic Compounds (VOC)**

For the surface coating operations performed in B48-1 through B48-5, SB42-3, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### **D.1.10 VOC Emissions**

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

#### **D.1.11 Particulate [326 IAC 6-3-2(d)]**

Pursuant to CP 039-10442-00087, issued April 21, 1999 and 326 IAC 6-3-2 (d), the dry filters for particulate matter overspray control shall be operated in accordance with manufacturer's specifications and control emissions from the surface coating facilities at all times when booths B48-6 through B48-8, are in operation.

#### **D.1.12 Monitoring [40 CFR 63, Subpart JJ] [326 IAC 14]**

- 
- (a) For the surface coating operations, B48-6 through B48-8, and SB42-3, the Permittee shall implement an operator-training program.
- (1) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**D.1.13 Particulate [326 IAC 6-3-2(d)]**

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The dry filters for particulate control shall be operated in accordance with manufacturer's specifications and control emissions from the surface coating facilities at all times when booths B48-1 through B48-5, SB42-3, lam42, and the fiberglass described in Section D.3, are in operation.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.14 Record Keeping Requirements**

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For the surface coating operations performed in B48-1 through B48-5, SB42-3, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The volume weighted VOC content of the coatings used for each month;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

- (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
- (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
- (4) The VHAP content in weight percent of each thinner used.
- (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Conditions D.1.11 and D.1.12, the Permittee shall maintain records of any non-routine maintenance activities performed on particulate emission control devices which have air flows greater than four thousand (4,000) cfm.
- (e) To document compliance with Condition D.1.12, the training program shall be written and retained on site or electronically accessible. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventive Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.15 Reporting Requirements

For the surface coating operations performed in B48-1 through B48-5, SB42-3, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.
- (c) Pursuant to the schedule required by 40 CFR 63.807(c)(2), subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
- (d) The reports required in (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Monaco Coach Corporation  
Nappanee, Indiana  
Permit Reviewer: Melissa Groch

Second Minor Permit Modification: 039-17437-00087  
Modified by: ERG/AAB

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OP No. T039-6116-00087

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

(b) Woodworking Operations controlled by:

- (1) One (1) baghouse for particulate control, located in Plant 48, identified as D48-01, with a maximum capacity of 10000 pounds per hour, and exhausting at stack D48-01.
- (2) One (1) cyclone for particulate control, located in Plant 48, identified as D48-02, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D48-02.
- (3) One (1) cyclone for particulate control, located in Plant 42, identified as D42-01, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D42-01.
- (4) One (1) baghouse for particulate control, located in Plant 42, identified as D42-02, controlling emissions from woodworking equipment with a maximum throughput capacity of 3,000 pounds per hour, and exhausting at stack D42-02.
- (5) One (1) baghouse for particulate control, located in Plant 48, identified as D48-05, controlling emissions from woodworking equipment with a maximum throughput capacity of 13,000 pounds per hour, and exhausting at stack D48-05.
- (6) One (1) baghouse for particulate control, located in Plant 48, identified as D48-03, controlling emissions from woodworking equipment with a maximum throughput capacity of 5,000 pounds per hour, and exhausting at stack D48-03.
- (7) One (1) baghouse for particulate control, located in Plant 48, identified as D48-04, controlling emissions from woodworking equipment with a maximum throughput capacity of 3,000 pounds per hour, and exhausting at stack D48-04.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable particulate emissions from the woodworking facilities shall not exceed the pounds per hour emission rates shown in the following table:

Stack	Process Weight (Pounds/Hour)	PM Emission Rate (lbs/hour)
D48-01	10,000	12.05
D48-02	2,000	4.10
D42-01	2,000	4.10
D42-02	3,000	5.40
D48-03	5,000	7.48

Stack	Process Weight (Pounds/Hour)	PM Emission Rate (lbs/hour)
D48-04	3,000	5.40
D48-05	13,000	13.4

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.2.2 Particulate Matter (PM and PM<sub>10</sub>) [326 IAC 2-2]

- (a) Baghouse D42-02 shall have an outlet grain loading of 0.01 grains/acf and an air flow rate of 12,500 acfm, which is equivalent to PM/PM<sub>10</sub> emissions of 4.7 tons per year.
- (b) Baghouse D48-05 shall have an outlet grain loading of 0.01 grains/acf and an air flow rate of 22,000 acfm, which is equivalent to PM/PM<sub>10</sub> emissions of 8.7 tons per year.

Compliance with this Condition makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.5 Particulate Matter (PM)

- (a) Pursuant to PC (20) 1730, issued on February 21, 1989;
  - (1) The baghouse D48-01 and cyclone D48-02, for PM control shall be in operation at all times when the woodworking facilities are in operation; and
  - (2) The visible emissions from the baghouse, D48-01 and D48-02, for PM control shall not exceed 10% opacity.
- (b) Cyclone D42-01 and the baghouses D42-02 and D48-05 used for PM control, shall be in operation at all times when the woodworking facilities are in operation.
- (c) Pursuant to MSM 039-15249-00087, issued May 9, 2002, the baghouses D48-03 and D48-04 for PM control shall be in operation at all times when the woodworking facilities are in operation.



## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.2.6 Visible Emissions Notations**

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- (a) Daily visible emission notations of baghouse and cyclone stack exhausts (D48-01, D48-02, D-48-03, D48-04, D48-05, D42-01 and D42-02) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

### **D.2.7 Particulate Control Equipment Inspections**

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- (a) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (b) An inspection shall be performed each calendar quarter of the cyclones controlling the woodworking operation when venting to the atmosphere. Cyclone inspections shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors.

### **D.2.8 Broken or Failed Bag Detection or Cyclone Failure Detection**

---

- (a) In the event that bag failure has been observed for the baghouse when venting to the atmosphere:
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation,

Implementation, Records, and Reports, shall be considered a violation of this permit.

- (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.2.9 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking stacks' exhaust when venting to the atmosphere. When equipment is venting into the building, no monitoring records will be required.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

#### (c) Fiberglass Operations:

- (1) One (1) fiberglass motor home parts manufacturing line (identified as SB42-1 and SB42-2), consisting of one (1) fiberglass booth equipped with one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system. The fiberglass booth (SB42-1) may be used for wood finishing operations using HVLP spray guns. The fiberglass booths (SB42-1 and SB42-2) are equipped with dry filters for overspray, which exhaust to stack GV42.
- (2) One (1) fiberglass prep and clean-up area, exhausting to stack GV42.
- (3) One (1) sander, with dry filters for PM control, exhausting to stack GV42.
- (4) Two (2) routers, each with dry filters for PM control, and both exhausting to stack GV42.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to CP 039-10299-00087, issued February 5, 1999, and 326 IAC 6-3 (Process Operations):

- (a) The fiberglass panel manufacturing line shall have a PM allowable emission using the following equation:

$$E = 4.10 P^{0.67}$$

Where: E = rate of emissions in pounds per hour  
P = Process weight rate in tons per hour.

- (b) The two (2) routers and one (1) sander have a process weight rate of 75 pounds per hour each and are not already regulated by 326 IAC 6-1 or any New Source Performance Standard, therefore the allowable PM emissions shall not exceed 0.551 pounds per hour each.

#### D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to CP 039-10299-00087, issued February 5, 1999, the VOC content of the gel coats and resins delivered to the applicator of the fiberglass operation shall be limited such that the potential emissions of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months, rolled on a monthly basis. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

#### D.3.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-1-4.4]

Pursuant to CP 039-10299-00087, issued February 5, 1999, the HAP content of the gel coats and resins delivered to the applicator of the fiberglass operation shall be limited such that the potential emissions of HAPs shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive months and a combination of HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive months, each rolled on a monthly basis. Therefore, 326 IAC 2-1-4.4, New Source Toxics Control, does not apply.

#### **D.3.4 Wood Finishing Operations**

---

The Permittee may use the fiberglass booths (SB42-1 and SB42-2) for fiberglass operations or wood finishing operations. The Permittee shall not simultaneously perform fiberglass and woodfinishing operations in the fiberglass booth. When used for wood finishing operations, the Permittee shall use HVLP spray guns and shall comply with the conditions provided in Section D.1 of this permit.

#### **D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### **Compliance Determination Requirements**

#### **D.3.6 Testing Requirements [326 IAC 2-1.1-11] [ 326 IAC 2-7-6(1),(6)]**

---

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.3.1, D.3.2, and D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### **D.3.7 Volatile Organic Compounds (VOC)**

---

Compliance with the VOC content and usage limitations contained in Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### **D.3.8 VOC Emissions (VOC)**

---

Pursuant to CP 039-10299-00087, issued February 5, 1999, compliance with the limit in Condition D.3.2, shall be determined based upon the following criteria:

- (a) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, multiplying the other material usage rates by the percent VOC and summing those emissions for all gel coats, resins and all other VOC containing materials. Emission factors shall be obtained from the reference approved by IDEM, OAQ (specified below).
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Models for Open Molding of Composites", Composites Fabricators Association, July 2001.

#### **D.3.9 HAP Emissions (HAP)**

---

Pursuant to CP 039-10299-00087, issued February 5, 1999, compliance with the limit in Condition D.3.3, shall be determined based upon the following criteria:

- (a) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. HAPs' emissions shall be calculated by multiplying the HAPs' usage of each gel coat and resin by the emission factor that is appropriate for the monomer content and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ (specified below).
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the

following reference approved by IDEM, OAQ: "Unified Emission Models for Open Molding of Composites", Composites Fabricators Association, July, 2001.

#### **D.3.10 Particulate Matter (PM)**

---

Pursuant to CP 039-10299-00087, issued February 5, 1999, the dry filters for particulate matter overspray shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the fiberglass manufacturing line, including the sander and routers, is in operation.

#### **D.3.11 Monitoring**

---

- (a) Pursuant to CP 039-10299-00087, issued February 5, 1999:
- (1) All operators that perform spray-up or gelcoat operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.3.12 Record Keeping Requirements**

---

Pursuant to CP 039-10299-00087, issued February 5, 1999:

- (a) To document compliance with Conditions D.3.2 and D.3.3, the Permitted shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs' emission limits established in Condition D.3.2 and D.3.3.
- (1) The amount of each resin and gel coat used. The VOC and mass weighted monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The volume weighted VOC content of the coatings used for each month;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month;
  - (5) The weight of VOCs emitted for each compliance period;
  - (6) The total HAP usage for each month; and
  - (7) Method of application and other emission reduction techniques for each resin and gel coat use for each month.

- (b) To document compliance with Condition D.3.10, the Permittee shall maintain records of any non-routine maintenance activities performed on particulate emission control devices which have air flows greater than four thousand (4,000) cfm.
- (c) To document compliance with Condition D.3.11, the training program shall be written and retained on site. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventive Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.13 Reporting Requirements

Pursuant to CP 039-10299-00087, issued February 5, 1999, a quarterly summary of the information to document compliance with Conditions D.3.2 and D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] and Insignificant Activity [326 IAC 2-7-1(21)]:

- (a) The following equipment, identified as W43 and T43, located in Plant 43, related to manufacturing activities not resulting in the emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Degreasing operations, located in Plant 43, identified as DG43, using mineral spirits as solvent, with a maximum throughput of 0.3 gallons per day, and exhausting at stack GV43.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3] (Process Operations), the allowable PM emission rate from facilities W43 and T43 shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.4.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

### Compliance Determination Requirement

#### D.4.3 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Monaco Coach Corporation  
Source Address: 1205 East Lincoln Street, Indiana 46550  
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573  
Part 70 Permit No.: T039-6116-00087

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE BRANCH**  
**100 North Senate Avenue**  
**P.O. Box 6015**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Monaco Coach Corporation  
Source Address: 1205 East Lincoln Street, Indiana 46550  
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573  
Part 70 Permit No.: T039-6116-00087

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - ☐ The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
Semi-Annual Report**

**VOC and VHAP usage - Wood Furniture NESHP**

Source Name: Monaco Coach Corporation  
Source Address: 1205 East Lincoln Street, Indiana 46550  
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573  
Part 70 Permit No.: T039-6116-00087  
Facility: Surface Coating Operations  
Parameter: VOC and VHAPs - NESHP  
Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids  
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight  
(3) All other thinner mixtures - 10% VHAP content by weight  
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids  
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: \_\_\_\_\_

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_

\_\_\_\_\_

Title/Position: \_\_\_\_\_

\_\_\_\_\_

Monaco Coach Corporation  
Nappanee, Indiana  
Permit Reviewer: Melissa Groch

Second Minor Permit Modification: 039-17437-00087  
Modified by: ERG/AAB

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OP No. T039-6116-00087

\_\_\_\_\_

Signature:

\_\_\_\_\_

\_\_\_\_\_

Date:

\_\_\_\_\_

Phone:

\_\_\_\_\_

\_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Monaco Coach Corporation  
Source Address: 1205 East Lincoln Street, Indiana 46550  
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573  
Part 70 Permit No.: T039-6116-00087  
Facility: Fiberglass Operations  
Parameters: VOC emissions (includes volatile organic HAP from resins and gel coats), single HAP and combination HAP PTE  
Limits: Less than 25 tons VOC per twelve month period  
Less than 10 tons HAPs per twelve month period for a single HAP  
Less than 25 tons HAPs per twelve month period for a combination HAPs  
During first twelve months of operation: single HAP less than 0.833 tons per month, and a combination of less than 2.08 tons per month

YEAR: \_\_\_\_\_

Month	Pollutant	Emissions (tons/month)	Emissions for previous twelve month period (tons)
	VOC		
	HAP		
	VOC		
	HAP		
	VOC		
	HAP		

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Monaco Coach Corporation  
Source Address: 1205 East Lincoln Street, Indiana 46550  
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573  
Part 70 Permit No.: T039-6116-00087  
Facility: Surface Coating and Fiberglass operations  
Parameter: VOC emissions  
Limit: 250 tons per 12 consecutive month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Monaco Coach Corporation  
Source Address: 1205 East Lincoln Street, Indiana 46550  
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573  
Part 70 Permit No.: T039-6116-00087

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



June 19, 2003

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document (TSD) for a Part 70 Minor Permit Modification

#### Source Background and Description

Source Name:	Monaco Coach Corporation
Source Location:	1205 East Lincoln Street, Nappanee, Indiana 46550
County:	Elkhart
SIC Code:	2431
Operation Permit No.:	T039-6116-00087
Date of Issuance:	June 26, 2002
Minor Permit Modification No.:	T039-17437-00087
Permit Reviewer:	ERG/AAB

On May 13, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Monaco Coach Corporation had applied for a Minor Permit Modification to a Part 70 Operating Permit to operate a new paint booth with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 27, 2003, Monaco Coach Corporation submitted comments on the proposed Minor Permit Modification. The summary of the comments is as follows:

#### Comment 1:

In Condition A.2(a)(1), the last sentence should be deleted because specifying the HVLP guns that may be used in Plant 42 is unnecessary.

#### Response to Comment 1:

The description of the surface coating facilities in Plant 48 have been revised as requested by Monaco Coach Corporation. The following changes have been made to Condition A.2(a) and to the description in Section D.1 of the permit:

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

##### (a) Surface Coating:

- (1) Five (5) paint booths, located in Plant 48, identified as B48-1 through B48-5, constructed in 1984, equipped with HVLP spray guns for wood furniture and cabinet coating, with a maximum capacity at each spray booth of five (5) gallons

per hour of coating, using dry filters for overspray control, and exhausting at stacks SV48-01 for booth B48-1, SV48-02 for B48-2, SV48-03 for B48-3, SV48-04 for B48-4, and SV48-05 for B48-5. ~~The HVLP spray guns may be used in the lamination and fiberglass booths (located in Plant 42) for wood furniture and cabinet coating.~~

**Comment 2:**

The last sentence in Condition A.2(c)(1) should be revised to delete the word "is."

**Response to Comment 2:**

The typographical error in Condition A.2(c)(1) has been corrected as shown below:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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...

(c) Fiberglass Operations:

- (1) One (1) fiberglass motor home parts manufacturing line (identified as booths SB42-1 and SB42-2), consisting of one (1) fiberglass booth equipped with one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system. The fiberglass booth may be used for wood finishing operations using HVLP spray guns. The fiberglass booths (SB42-1 and SB42-2) ~~is~~ are equipped with dry filters for overspray which exhaust to stack GV42.

**Comment 3:**

The units identified in Condition A.3 are exempt from the cited regulations and, as such, should not be included as a specifically regulated insignificant activity. Therefore, Conditions A.3(a) and (b) should be deleted.

**Response to Comment 3:**

Condition A.3 was not changed from the originally issued Title V permit because it was not part of the Minor Permit Modification. In addition, the issues raised by the source are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 4:**

Requiring Preventive Maintenance Plans when documents developed in response to other permit conditions contain the information required for Preventive Maintenance Plans is unnecessary and duplicative. Therefore, Condition B.11 should be revised by adding the following new paragraph after the address for IDEM, OAQ's Compliance Branch: "If the information specified in Condition B.11(a) has been developed in response to other Conditions of this permit and is contained in other documents, the Permittee is not required to create a separate Preventive Maintenance Plan(s)."

**Response to Comment 4:**

The issues raised by the source are currently under review by the Department as part of an appeal to the Title V permit submitted by the source in 2002. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal. However, some minor updates to this condition have been made since the Title V permit was issued. Condition B.11 (b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been deleted because the general record keeping requirements (ie retained for 5 years) are in Section C. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so (d) has been added to this condition.

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The ~~PMP and the~~ PMP extension notification **does** not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The~~

~~records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

- (d) **To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

**Comment 5:**

Condition B.11(c) purports to allow IDEM to order the Petitioner to revise a Preventative Maintenance Plan in certain circumstances. This condition is beyond the requirements of 326 IAC 1-6-3 and is not authorized by 326 IAC 2-7-5(1), (3) and (13) or 326 IAC 2-7-6(1) and (6). Therefore, Condition B.11(c) should be revised by deleting the second sentence.

**Response to Comment 5:**

Condition B.11(c) was not changed from the originally issued Title V permit because it was not part of the Minor Permit Modification. In addition, the issues raised by the source are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 6:**

Condition B.22(e) is not one of the listed authorizations in 326 IAC 2-7-6(2) and exceeds the authority granted by statute. Therefore, Condition B.22(e) should be deleted.

**Response to Comment 6:**

For clarification, additional rule citations have been added to Condition B.22.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~inspect~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~sample~~ or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**Comment 7:**

Condition C.2 incorrectly states the applicable requirements of the version 326 IAC 6-3 that is incorporated into 40 CFR 52, Subpart P. The version of 326 IAC 6-3 that was incorporated into 40 CFR 52, Subpart P does not specify the appropriate emission rate for processes with a process weight of less than 100 pounds per hour. Therefore, stating 40 CFR 52, Subpart P requires processes with a process weight rate of less than 100 pounds per hour to comply with emission rate of 0.551 pounds per hour is incorrect. For this reason, Condition C.2 should be deleted and replaced with language that accurately reflects the applicable provisions of 40 CFR 52, Subpart P.

**Response to Comment 7:**

Although 326 IAC 6-3 was revised on June 12, 2002, the revisions have not been approved by the EPA into the State Implementation Plan (SIP). Therefore, the source remains subject to the requirements of the previous version of 326 IAC 6-3 until the revisions are approved into the SIP (40 CFR 52, Subpart P). The source is required to comply with both the State rule and the EPA approved rule in 40 CFR 52, Subpart P. However, the State rule is not Federally Enforceable until after EPA approves the changes to the SIP. For clarification purposes, Condition C.2 has been revised as follows:

**C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2(c)]**

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- (a) Pursuant to 40 CFR 52, Subpart P, the ~~allowable~~ particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) **Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.**

**Comment 8:**

Condition C.7 requires the use of air pollution control equipment when the emission units vented to the equipment are operating. This condition is overly broad because it requires the air pollution control equipment to be in operation even if the emission unit is not vented to the atmosphere. In addition, this condition could be read to require the use of air pollution control equipment even if that equipment is not necessary to comply with an emission limit. Therefore, Condition C.7 should be revised to require operation of only the air pollution control equipment that are necessary to comply with an emission limit. Further, the phrase "and venting to the atmosphere" should be added at the end of this condition.

**Response to Comment 8:**

Condition C.7 was not changed from the originally issued Title V permit because it was not part of the Minor Permit Modification. In addition, the issues raised by the source are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 9:**

Condition C.17 is beyond the scope of the regulations because neither 326 IAC 2-7-5 nor 326 IAC 2-7-6 authorize a Compliance Response Plan and agency guidance cannot serve to alter, amend or expand duly promulgated regulations. In addition, the condition fails to recognize that a Compliance Response Plan does not have to be an entirely new document. To the extent a Compliance Response Plan is necessary, the plan should be able to reference information contained in other documents. As applied to this source, Condition C.17 would be duplicative and unnecessarily burdensome. Therefore, Condition C.17 should be deleted.

**Response to Comment 9:**

The issues raised by the Permittee concerning IDEM's authority to require Compliance Response Plans are currently under review by the Department as part the appeal to the Title V permit submitted by the Permittee in 2002. This issue will therefore be addressed by IDEM, OAQ during the review of the appeal. The use of other documents to satisfy the requirements of the CRP has been reviewed by IDEM, OAQ, which has determined that, for sources that are required to have an Operation, Maintenance and Monitoring (OMM) Plan or Start-up, Shutdown, and Malfunction (SSM) Plan, an OMM or SSM can satisfy the requirements for having a CRP. If a source is required to have an SSM Plan, a Parametric Monitoring Plan would also be required to satisfy the requirements to have a CRP. Additional language has been added for these options. Failure to take reasonable response steps shall be considered deviation of the permit; therefore, (b)(4) was revised. Language was added to (e) to clarify that the records that need to be kept are those instances when, in accordance with Section D, response steps are taken. Condition C.17 has been revised as follows:

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.** A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)** and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

**The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.**

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)**; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)** is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, **in accordance with Section D**, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**Comment 10:**

In Condition C.19(b), the annual emission statement period should be changed to "...the twelve (12) consecutive month time period starting January 1 and ending December 31." This is consistent with other reporting time frames established by the State and is consistent with current reporting time periods.

**Response to Comment 10:**

Condition C.19(b) was not changed from the originally issued Title V permit because it was not part of the Minor Permit Modification. In addition, the issues raised by the source are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 11:**

Conditions C.21(a) and (d) impose a deadline to submit reports that is not specified in the regulations and is an insufficient amount of time for Monaco. In addition, Condition C.21(a) imposes a frequency to submit deviation and compliance monitoring reports that is excessive and unduly burdensome. Therefore, Condition C.21(a) should be revised by deleting the word "Quarterly" in the first sentence and replacing it with the word "Semi-annual." In addition, Condition C.21(a) and (d) should be revised by deleting the phrase "within thirty (30) days" from each Condition and replacing it with the phrase "within sixty (60) days."

**Response to Comment 11:**

Conditions C.21(a) and (d) were not changed from the originally issued Title V permit because these conditions were not part of the Minor Permit Modification. In addition, the issues raised by the source are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 12:**

The last sentence in the facility description in Section D.1 should be deleted because specifying the HVLP guns that may be used in Plant 42 is unnecessary.

**Response to Comment 12:**

See the response to Comment 1.

**Comment 13:**

Condition D.1.3 fails to include the current requirements of 326 IAC 6-3-2, such as 326 IAC 6-3-2(d). Therefore, Condition D.1.3 should be revised to include the current appropriate requirements of 326 IAC 6-3-2.

**Response to Comment 13:**



Although 326 IAC 6-3 was revised on June 12, 2002, the revisions have not yet been approved by the EPA into the State Implementation Plan (SIP). Therefore, the previous version of 326 IAC 6-3 remains applicable to Title V sources until the revisions are approved in the SIP (40 CFR 52, Subpart P). This condition and Conditions D.1.12 and D.1.14 were revised in the previous Minor Permit Modification to clarify the particulate rules currently applicable to this source. Therefore, no changes have been made to Conditions D.1.3, D.1.12 or D.1.14 as a result of this comment.

**Comment 14:**

Condition D.1.7 is addressed in other D.1 conditions. This condition is confusing and unnecessary and should be deleted.

**Response to Comment 14:**

This condition has been deleted since the requirements for the gelcoat booths used for wood surface coating (the alternative operating scenario for the booths) are described throughout Section D.1. IDEM, OAQ agrees that it is not necessary to state the source of guns used in the gelcoat booth or require the booth to be used only for one type of operation. Conditions D.1.8 through to the end of this section have been renumbered as appropriate.

~~D.1.7 Lamination Booth Operation~~

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~~The Permittee may use the lamination booth for fiberglass operations or wood finishing operations. The Permittee shall not simultaneously perform fiberglass and woodfinishing operations in the lamination booth. When used for wood finishing operations, the Permittee shall use HVLP spray guns from paint booths B48-1 through B48-5.~~

**Comment 15:**

Condition D.1.7 (previously Condition D.1.8) purports to require Preventative Maintenance Plans be developed for facilities and control devices. The underlying regulation, 326 IAC 1-6-3 only requires Preventative Maintenance Plans for control devices, not facilities. Therefore, Condition D.1.8 should be revised by deleting the phrase "this facility and any control devices" located at the end of the condition and replacing it with the phrase "the control devices."

**Response to Comment 15:**

The Preventive Maintenance Plan applies to both emission units and control devices. As indicated in 326 IAC 1-6-4, owners and operators are responsible for operating and maintaining process equipment in compliance with all applicable rules. The Preventive Maintenance Plan is required for emission units because lack of proper maintenance of an emission unit may cause or contribute to a violation of an emission limitation or other regulation even when an emission unit is equipped with a control device. Hence, the Preventive Maintenance Plan is required for the facilities described in Section D.1 as well as the control devices. No changes have been made to the permit as a result of this comment.

**Comment 16:**

Condition D1.10 (previously Condition D.1.11) imposes a deadline to demonstrate compliance with volatile organic limitations that is not specified in the regulations and is an insufficient amount of time for Monaco. Therefore, Condition D.1.11 should be revised by deleting the phrase "within 30 days" and replacing it with the phrase "within 60 days."

**Response to Comment 16:**

Condition D.1.10 was not changed from the originally issued Title V permit because this condition was not part of the Minor Permit Modification. In addition, the issues raised by the source are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 17:**

Condition D.1.12(a)(1) (previously Condition D.1.13(a)(1)) requires all new operators to be trained upon hiring or transfer. As recognized by 326 IAC 20-25-8, a period of time is necessary to perform training of new operators. Therefore, to be consistent with 326 IAC 20-25-8, the last sentence of Condition D.1.13(a)(1) should be deleted and replaced with the following: "All new operators shall be trained within thirty (30) days of hiring or transfer."

**Response to Comment 17:**

The requirements outlined in Condition D.1.12 are from 40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations. Section 40 CFR 63.803(b) requires sources subject to this NESHAP to train employees. The rule states that "All new personnel ... shall be trained upon hiring." Since this is a Federal requirement, the revision requested by the source cannot be made. For clarification purposes, the following change has been made to Condition D.1.13.

**D.1.123 Monitoring [40 CFR 63, Subpart JJ] [326 IAC 14]**

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- (a) For the surface coating operations, B48-6 through B48-8, and SB42-3, the Permittee shall implement an operator-training program.
  - (1) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Comment 18:**

Condition D.1.14(e) (previously Condition D.1.15(e)) requires the training program to be maintained on-site but does not specify that documents available by computer are considered to be retained on-site. Therefore, Condition D.1.14(e) should be revised by adding the following sentence immediately following the first sentence: "Documents are considered to be retained on-site if they are available by computer."

**Response to Comment 18:**

It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following changes have been made to Condition C.20 and Condition D.1.14(e):

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- 
- (a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept~~ **physically present or electronically accessible** at the source location ~~Wakarusa location~~, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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#### D.1.14-5 Record Keeping Requirements

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- ...
- (e) To document compliance with Condition D.1.132, the training program shall be written and retained on site **or electronically accessible**. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventive Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.
- ...

#### Comment 19:

Condition D.1.15(a) (previously Condition D.1.16(a)) requires the submission of summaries on a quarterly basis which is not based on any regulation and is unduly burdensome and unreasonable. In addition, the Condition imposes a deadline to submit reports that is not specified in the regulations and is an insufficient amount of time for Monaco. Therefore, Condition D.1.16(a) should be revised by deleting the word "quarterly" by the phrase "within thirty (30) days" and replacing it with the phrase "within sixty (60) days."

#### Response to Comment 19:

Conditions D.1.15(a) was not changed from the originally issued Title V permit because this condition was not part of the Minor Permit Modification. In addition, the issue raised by the source is currently under review by the Department as part of an appeal and will be addressed by IDEM, OAQ during the review of the appeal.

#### Comment 20:

Condition D.2.3 purports to require Preventive Maintenance Plans be developed for this facility and its control device. The underlying regulation, 326 IAC 1-6-3, only requires Preventive Maintenance Plans for control devices, not facilities. Therefore, Condition D.2.4 should be revised by deleting the phrase "this facility and its control device" located at the end of the condition and replacing it with the phrase "the control device."

#### Response to Comment 20:

The Preventive Maintenance Plan applies to both emission units and control devices. As indicated in 326 IAC 1-6-4, owners and operators are responsible for operating and maintaining process equipment in compliance with all applicable rules. The Preventive Maintenance Plan is required for

emission units because lack of proper maintenance of an emission unit may cause or contribute to a violation of an emission limitation or other regulation even when an emission unit is equipped with a control device. Hence, the Preventive Maintenance Plan is required for the facilities described in Section D.2 as well as the control devices. No changes have been made to the permit as a result of this comment.

**Comment 21:**

Condition D.2.6(a) requires daily visible emission notations on units that have little potential to harm the environment. As such, requiring visible emission notations more frequently than monthly is unreasonable and unduly burdensome. Therefore, Condition D.2.6(a) should be revised by deleting the word "Daily" in the first sentence and replacing it with the word "Monthly."

**Response to Comment 21:**

Condition D.2.6(a) was not changed from the originally issued Title V permit because this condition was not part of the Minor Permit Modification. In addition, the issue raised by the source is currently under review by the Department as part of an appeal. This issue will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 22:**

Condition D.2.6(e) references Compliance Response Plans that, as previously stated, are not required by the regulations. Because Compliance Response Plans are not required by the regulations, the reference to Compliance Response Plans in this condition is unnecessary. Therefore, Condition D.2.6(e) should be deleted.

**Response to Comment 22:**

See the response to Comment 9.

**Comment 23:**

Conditions D.2.7(a) and (b) require the inspection of bags and cyclones on a schedule that is excessive, unnecessary, and more frequent than recommended by the manufacturer. Therefore, Conditions D.2.7(a) and (b) should be revised by deleting the phrase "each calendar quarter" and replacing it with the phrase "semi-annually" in the first sentence of each condition. In addition, the second sentence of each condition should be revised by deleting the phrase "three months thereafter" located at the end of the sentence and replacing it with the phrase "six months thereafter."

**Response to Comment 23:**

The control devices must be maintained and operated correctly to ensure compliance with the particulate emission limitations in Condition D.2.1. The IDEM, OAQ believes that semiannual inspections would not be frequent enough to ensure operation of the control devices. Since the control devices are required for the woodworking operations to stay in compliance, the IDEM, OAQ believes that quarterly inspections are a reasonable requirement. Note that inspections are only required when emissions are vented to the outside atmosphere. No changes have been made to the permit as a result of this comment.

**Comment 24:**

Conditions D.2.8(a)(1) and (b) reference Compliance Response Plans that, as previously stated, are not required by the regulations. Because Compliance Response Plans are not required by the regulations, the reference to Compliance Response Plans in these conditions is unnecessary. Therefore, Condition D.2.8(a)(1) should be revised by deleting the last three sentences and Condition D.2.8(b) should be revised by deleting the last sentence.

**Response to Comment 24:**

See the response to Comment 9.

**Comment 25:**

Condition D.2.9(a) references daily visible emission notations that are not required by the regulations and, as previously stated, are unreasonable and unduly burdensome. Therefore, Condition d.2.9(a) should be revised by deleting the word “daily” in the first sentence and replacing it with the word “monthly.”

**Response to Comment 25:**

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on-site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. Monthly visible emission notations would not be frequent enough to ensure continuous compliance with the emission limitations. The IDEM, OAQ, therefore, believes that daily visible emissions notations is a reasonable requirement because the woodworking operations require the cyclones and baghouses to stay in compliance. No changes have been made to the permit as a result of this comment.

**Comment 26:**

Condition D.3.5 purports to require Preventive Maintenance Plans be developed for this facility and its control device. The underlying regulation, 326 IAC 1-6-3 only requires Preventive Maintenance Plans for control devices, not facilities. Therefore, Condition D.3.5 should be revised by deleting the phrase “this facility and its control device” located at the end of the condition and replacing it with the phrase “the control device.”

**Response to Comment 26:**

The Preventive Maintenance Plan applies to both emission units and control devices. As indicated in 326 IAC 1-6-4, owners and operators are responsible for operating and maintaining process equipment in compliance with all applicable rules. The Preventive Maintenance Plan is required for emission units because lack of proper maintenance of an emission unit may cause or contribute to a violation of an emission limitation or other regulation even when an emission unit is equipped with a control device. Hence, the Preventive Maintenance Plan is required for the facilities described in Section D.3 as well as the control devices. No changes have been made to the permit as a result of this comment.

**Comment 27:**

Condition D.3.8(b) references a different version of the CFA's emission rates than Condition D.3.9(b). Therefore, the phrase "April 1999" at the end of Condition D.3.8(b) should be deleted and replaced with the phrase "July 2001."

**Response to Comment 27:**

The reference to the *Unified Emission Models for Open Molding of Composites*, published by the Composites Fabricators Association should reference the July 2001 version. The following change has been made to the permit:

**D.3.8 VOC Emissions (VOC)**

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...

- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Models for Open Molding of Composites", Composites Fabricators Association, ~~April, 1999~~ **July 2001**.

**Comment 28:**

Conditions D.3.10 and D.3.11 should be deleted because the facility complies with the applicable particulate emissions limits without the use of controls. Therefore, the Conditions are unnecessary and should be deleted in their entirety. To the extent the operator training provisions of Condition D.3.11(a)(1) are necessary, Condition D.3.11(a)(1) should be revised to be consistent with 326 IAC 20-25-8. As recognized by 326 IAC 20-25-8, a period of time is necessary to perform training of new operators. Therefore, to be consistent with 326 IAC 20-25-8, the last sentence of Condition D.3.11(a)(1) should be deleted and replaced with the following: "All new operators shall be trained within thirty (30) days of hiring or transfer."

**Response to Comment 28:**

Conditions D.3.10 and D.3.11 were not changed from the originally issued Title V permit because these conditions were not part of the Minor Permit Modification. In addition, the issues raised by the source are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 29:**

Conditions D.3.12(b) and (c) reference the wrong conditions. They should reference Conditions D.3.10 and D.3.11. Further, Conditions D.3.12(b) and (c) are unnecessary because Conditions D.3.10 and D.3.11 are unnecessary. Therefore, Conditions D.3.12(b) and (c) should be deleted.

**Response to Comment 29:**

The references included in Conditions D.3.12(b) and (c) have been corrected as shown below. For the applicability of Conditions D.3.10 and D.3.11, see the response to comment 28.

**D.3.12 Record Keeping Requirements**

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...

- (b) To document compliance with Condition D.3.9 ~~10~~, the Permittee shall maintain records of any non-routine maintenance activities performed on particulate emission control devices which have air flows greater than four thousand (4,000) cfm.

- (c) To document compliance with Condition D.3.13, the training program shall be written and retained on site. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventive Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.

...

**Comment 30:**

Condition D.3.13 should be revised because it requires the submission of summaries on a quarterly basis which is not based on any regulation and is unduly burdensome and unreasonable. In addition, this condition imposes a deadline to submit reports that is not specified in the regulations and is an insufficient amount of time for Monaco. Therefore, Condition D.3.13 should be revised by deleting the words "quarterly" and "quarter" and replacing them with the word "semi-annual" and the phrase "semi-annual period," respectively. In addition, delete the phrase "within thirty (30) days" and replace it with the phrase "within sixty (60) days."

**Response to Comment 30:**

Condition D.3.13 was not changed from the originally issued Title V permit because this condition was not part of the Minor Permit Modification. In addition, the issues raised by the source are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 31:**

The Part 70 Operating Permit Semi-Annual Report form is confusing and serves no value. This form should be deleted because it confirms compliance which is more appropriately addressed in a compliance certification statement and the deviation reports. This form should be deleted.

**Response to Comment 31:**

The reporting form was not changed from the originally issued Title V permit because this form was not part of the Minor Permit Modification. In addition, the issues raised in this comment are currently under review by the Department as part of an appeal and will therefore be addressed by IDEM, OAQ during the review of the appeal.

**Comment 32:**

The Part 70 Quarterly Reports and Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report should be revised because they refer to quarterly reports which are at a frequency in excess of that required by the regulations and, as such, are unduly burdensome and unreasonable. These forms should be revised to indicate semi-annual reporting instead of quarterly reporting.

**Response to Comment 32:**

The reporting forms were not changed from the originally issued Title V permit because these forms were not part of the Minor Permit Modification. In addition, the issues raised in this comment are currently under review by the Department as part of an appeal. These issues will therefore be addressed by IDEM, OAQ during the review of the appeal.

June 19, 2003

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Minor Source Modification and Part 70 Minor Permit Modification

#### Source Background and Description

Source Name:	Monaco Coach Corporation
Source Location:	1205 East Lincoln Street, Nappanee, Indiana 46550
County:	Elkhart
SIC Code:	2431
Operation Permit No.:	039-6116-00087
Operation Permit Issuance Date:	June 26, 2002
Minor Source Modification No.:	039-17375-00087
Minor Permit Modification No.:	039-17437-00087
Permit Reviewer:	ERG/AAB

The Office of Air Quality (OAQ) has reviewed a modification application from Monaco Coach Corporation relating to the construction of the following emission unit and pollution control devices:

(a) Surface Coating:

- (3) One (1) paint booth (identified as SB42-3), located in Plant 42, used in conjunction with SB 42-1 and SB42-2 for coating wood cabinets using HVLP spray guns and having a maximum throughput capacity of 120 units per hour. Emissions of particulate matter are controlled using dry filters, which exhaust at stack SV42-3. This unit will be constructed in 2003.

The source also requested the following changes be made to the permit:

1. Rename the existing fiberglass and resin application booths as SB42-1 and SB42-2:

The existing fiberglass operation consists of two surface coating booths with one booth used for fiberglass application and the other booth used for resin application. Since these booths will at times be used in conjunction with the new surface coating booth, the source has requested for clarification purposes that these booths be renamed as SB42-1 and SB42-2. This change has been incorporated as shown in the "Proposed Changes" section of this document.

2. Delete the reference to the number of HVLP guns per booth from the description of the surface coating booths:

Due to the frequent changes between surface coating applied, the HVLP spray guns are dedicated to one surface coating. This approach reduces the amount of cleaning solvent used for cleaning HVLP guns. This change has been incorporated as shown in the "Proposed Changes" section of this document.



3. Correct the description of control device D48-02:

Control device D48-02 was originally described as a cyclone in the Title V permit. In error, the source requested the description of this control device be changed from "cyclone" to "baghouse" in the Minor Permit Modification No. 039-16199-00087, issued April 8, 2003. However, the source has now realized that the control device is in fact a cyclone and the description should not have been changed in the Minor Permit Modification. This change has been incorporated as shown in the "Proposed Changes" section of this document.

4. Update the expiration date of the permit to the date five years from issuance of this modification:

The expiration date of the Title V permit cannot be revised as requested by Monaco Coach because Title V permits have a fixed term of not more than five years (see 326 IAC 2-7-5(2)).

### History

On March 18, 2003, Monaco Coach Corporation (Monaco) submitted an application to IDEM, OAQ requesting permission to construct a new surface coating booth in Plant 42. The new paint booth will be used in conjunction with the existing fiberglass booths to form a surface coating line similar to the one currently located in Plant 48. The fiberglass booths may also be used under the alternative operating scenario already included in the permit (see Section D.3).

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV42-3	Surface Coating Booth SB42-3	15	2	15,000	Ambient

### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 18, 2003.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, 1 page).

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical

or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	18.6
PM-10	18.6
SO <sub>2</sub>	0.00
VOC	75.3
CO	0.00
NO <sub>x</sub>	0.00

  

HAPs	Potential To Emit (tons/year)
Total HAPs	8.1

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(9), because this modification consists of installing an additional surface coating booth which is of the same type as the existing permitted surface coating booths and which will comply with the same applicable requirements and permit terms and conditions as the existing surface coating booths. In the current Title V permit, the VOC emissions from the source are limited to less 250 tons per year. The source will continue to comply with this VOC limit. Therefore, this modification is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

The permit modification is being performed through a Minor Permit Modification pursuant to 326 IAC 2-7-12(b) because it does not violate any applicable requirements and does not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 Permit.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	<250
PM-10	<250
SO <sub>2</sub>	<100
VOC	<250
CO	<100
NO <sub>x</sub>	<100

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and is not one of the 28 listed source categories.
- (b) These emissions are based upon the Title V permit (No. T039-6116-00087), which was issued on June 26, 2002.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Total emissions for modification	0.93	0.93	0.00	75.3	0.00	0.00
Total emissions from existing emission unit	57.3	57.3	<100	<250	<100	<100
Total emission from source after modification	58.3	58.3	<100	<250	<100	<100
PSD Threshold Levels	250	250	250	250	250	250

This modification to an existing major stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The new surface coating facility is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations (326 IAC 20-14) because it is used to apply surface coatings to wood furniture and is located at a plant that is a major source of hazardous air pollutants. Pursuant to 40 CFR JJ, the new surface coating booth shall comply with the same requirements as those currently required for the existing surface coating booths.
- (c) This minor modification does not involve a pollutant-specific emissions unit:
  - (1) with the potential to emit air pollutants (including VOC) before controls equal to or greater than one hundred (100) tons per year, and
  - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

In a previous permit (PC(20) 1730, issued February 21, 1989), the VOC emissions from this source were limited so that the source could remain a minor source under 326 IAC 2-2 (PSD). Although the source is adding an additional coating booth, the source will continue to comply with the existing 250 tons per year VOC limit. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

#### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)**

Although the potential HAP emissions are greater than the major thresholds (i.e., greater than 10 tons per year for a single HAP and greater than 25 tons per year for a combination of HAPs), the proposed modification does not trigger 326 IAC 2-4.1 because the new surface coating booth is subject to the requirements of 40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has potential to emit VOC greater than 10 tons of VOC per year. Pursuant to this rule the Permittee must submit an annual emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The emission statement should cover the period defined in 326 IAC 2-6-2(8) for emission statement operating year.

#### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Surface Coating Booth SB42-3**

#### **326 IAC 8-1-6 (New Facilities - General Reduction Requirements)**

Although constructed after January 1, 1980, the new surface coating booth is not subject to the requirements of 326 IAC 8-1-6 because the new surface coating booth is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

#### **326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)**

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The will comply with this rule using HVLP guns in the new surface coating booth.

#### **326 IAC 6-3-2 (Particulate Emission Limitation)**

On June 12, 2002, revisions to the 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the allowable particulate emission rate from the surface coating booth SB42-3 shall not exceed the pounds per hour limit calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the surface coating booth at all times the booth is in operation. This requirement to operate the control is not federally enforceable.

## **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

The surface coating operation has applicable compliance monitoring conditions as specified below:

- (a) For the surface coating operations, SB42-1 through SB42-3, the Permittee shall implement an operator-training program.
  - (1) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must be maintained and operated properly to ensure compliance with 40 CFR 52, Subpart P.

## **Testing**

Testing is not required for the new surface coating operation, because the source will demonstrate compliance with the VOC limitation by maintaining records of VOC usage.

## **Proposed Changes**

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Surface Coating:

- (1) Five (5) paint booths, located in Plant 48, identified as B48-1 through B48-5, constructed in 1984, equipped with ~~five (5)~~ HVLP spray guns for wood furniture and cabinet coating, with a maximum capacity at each spray booth of five (5) gallons per hour of coating, using dry filters for overspray control, and exhausting at stacks SV48-01 for booth B48-1, SV48-02 for B48-2, SV48-03 for B48-3, SV48-04 for B48-4, and SV48-05 for B48-5. ~~Three (3) of the five (5)~~ **The** HVLP spray guns may be used in the lamination and fiberglass booths (located in Plant 42) for wood furniture and cabinet coating.
- (2) One (1) wood finishing paint line, located in Plant 48, consisting of the following equipment:
  - (B) Three (3) paint booths, identified as B48-6 through B48-8, constructed in 1999, equipped with ~~three (3)~~ HVLP guns for stain, topcoat and sealer applications, with a total maximum raw material throughput of 120 units per hour per booth, using dry filters for overspray control, and exhausting at stacks SV48-6, SV48-7 and SV48-8, respectively.
- (3) **One (1) paint booth (identified as SB42-3), located in Plant 42, used in conjunction with SB42-1 and SB42-2 for coating wood cabinets using HVLP spray guns and having a maximum throughput capacity of 120 units per hour. Emissions of particulate matter are controlled using dry filters, which exhaust at stack SV42-3. This unit was constructed in 2003.**
- (34) One (1) lamination spray adhesive booth, located in Plant 42, identified as lam42, using ~~one (1)~~ a HVLP spray gun, with a maximum capacity of 14 gallons per day of adhesive, using dry filters for overspray control, and exhausting at GV42. The lamination booth may be used for wood finishing operations using HVLP spray guns from paint booths B48-1 through B48-5.

(b) Woodworking Operations controlled by:

- (2) One (1) ~~baghouse~~ **cyclone** for particulate control, located in Plant 48, identified as D48-02, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D48-02.

(c) Fiberglass Operations:

- (1) One (1) fiberglass motor home parts manufacturing line (**identified as booths SB42-1 and SB42-2**), consisting of one (1) fiberglass booth equipped with one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system. The fiberglass booth may be used for wood finishing operations using HVLP spray guns ~~from paint booths B48-1 through B48-5~~. **The fiberglass booths (SB42-1 and SB42-2) are** equipped with dry filters for overspray which exhaust to stack GV42.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

(a) Surface Coating:

- (1) Five (5) paint booths, located in Plant 48, identified as B48-1 through B48-5, constructed in 1984, equipped with ~~five (5)~~ HVLP spray guns for wood furniture and cabinet coating, with a maximum capacity at each spray booth of five (5) gallons per hour of coating, using dry filters for overspray control, and exhausting at stacks SV48-01 for booth B48-1, SV48-02 for B48-2, SV48-03 for B48-3, SV48-04 for B48-4, and SV48-05 for B48-5. ~~Three (3) of the five (5)~~ The HVLP spray guns may be used in the lamination and fiberglass booths (located in Plant 42) for wood furniture and cabinet coating.
- (2) One (1) wood finishing paint line, located in Plant 48, consisting of the following equipment:
  - (A) One (1) wood prep and clean-up area with a total maximum raw material throughput of 120 units per hour per booth; and
  - (B) Three (3) paint booths, identified as B48-6 through B48-8, constructed in 1999, equipped with ~~three (3)~~ HVLP guns for stain, topcoat and sealer applications, with a total maximum raw material throughput of 120 units per hour per booth, using dry filters for overspray control, and exhausting at stacks SV48-6, SV48-7 and SV48-8, respectively.
- (3) **One (1) paint booth (identified as SB42-3), located in Plant 42, used in conjunction with SB42-1 and SB42-2 for coating wood cabinets using HVLP spray guns and having a maximum throughput capacity of 120 units per hour. Emissions of particulate matter are controlled using dry filters, which exhaust at stack SV42-3. This unit was constructed in 2003.**
- (34) One (1) lamination spray adhesive booth, located in Plant 42, identified as lam42, using ~~one (1)~~ a HVLP spray gun, with a maximum capacity of 14 gallons per day of adhesive, using dry filters for overspray control, and exhausting at GV42. The lamination booth may be used for wood finishing operations using HVLP spray guns from paint booths B48-1 through B48-5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for B48-1 through B48-5, and ~~lam42~~ **SB42-3**, pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, and pursuant to Administrative Amendment 039-16234-00087 for lam42 and the fiberglass booths **(SB42-1 and SB42-2)** in Section D.3, the surface coatings applied to wood furniture and cabinets shall utilize one of the following application methods:

### D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P and pursuant to PC (20) 1730, issued on February 21, 1989 for B48-1 through B48-5, and pursuant to the Exemption issued on March 4, 1987, and CP 039-10442-00087, issued April 21, 1999 for B48-6 through B48-8, and pursuant to Administrative Amendment 039-16234-00087 for lam42 and the fiberglass booth in Section D.3 **and pursuant to MSM 039-**



**17357-00087 for SB42-3**, the PM from each of the surface coating operations, shall not exceed the pound per hour emission rate established as E in the following formula:

**D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]**

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For the surface coating operations performed in B48-1 through B48-5, **SB42-3**, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

**D.1.6 Work Practice Standards [40 CFR 63.803]**

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For the surface coating operations, performed in B48-1 through B48-5, **SB42-3**, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum addresses each of the following work practice standards as defined under 40 CFR 63.803:

**D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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For the surface coating operations B48-1 through B48-5, **SB42-3**, lam42, and the fiberglass booths described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, a Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**D.1.9 Testing Requirements [ 326 IAC 2-1.1-11] [326 IAC 2-7-6(1),(6)] [40 CFR 63]**

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For the surface coating operations performed in B48-1 through B48-5, **SB42-3**, lam42 and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 24, 1999, for B48-6 through B48-8:

**D.1.10 Volatile Organic Compounds (VOC)**

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For the surface coating operations performed in B48-1 through B48-5, **SB42-3**, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.13 Monitoring**

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- (a) For the surface coating operations, B48-6 through B48-8, **and SB42-3**, the Permittee shall implement an operator-training program.

**D.1.14 Particulate [326 IAC 6-3-2(d)]**

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The dry filters for particulate control shall be operated in accordance with manufacturer's specifications and control emissions from the surface coating facilities at all times when booths B48-1 through B48-5, **SB42-3**, lam42, and the fiberglass described in Section D.3, are in operation.

**D.1.15 Record Keeping Requirements**

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For the surface coating operations performed in B48-1 through B48-5, **SB42-3**, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

**D.1.16 Reporting Requirements**

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For the surface coating operations performed in B48-1 through B48-5, **SB42-3**, lam42, and the fiberglass booth described in Section D.3, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

#### D.2.5 Particulate Matter (PM)

- (a) Pursuant to PC (20) 1730, issued on February 21, 1989;
- (1) The baghouses, D48-01 and **cyclone** D48-02, for PM control shall be in operation at all times when the woodworking facilities are in operation; and

### SECTION D.3 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)]:

- (c) Fiberglass Operations:
- (1) One (1) fiberglass motor home parts manufacturing line (**identified as SB42-1 and SB42-2**), consisting of one (1) fiberglass booth equipped with one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system. The fiberglass booth (**SB42-1**) may be used for wood finishing operations using HVLP spray guns ~~from paint booths B48-1 through B48-5~~. The fiberglass booths (**SB42-1 and SB42-2**) ~~is~~ **are** equipped with dry filters for overspray, which exhaust to stack GV42.
- (2) One (1) fiberglass prep and clean-up area, exhausting to stack GV42.
- (3) One (1) sander, with dry filters for PM control, exhausting to stack GV42.
- (4) Two (2) routers, each with dry filters for PM control, and both exhausting to stack GV42.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### D.3.4 Wood Finishing Operations

The Permittee may use the fiberglass booths (**SB42-1 and SB42-2**) for fiberglass operations or wood finishing operations. The Permittee shall not simultaneously perform fiberglass and woodfinishing operations in the fiberglass booth. When used for wood finishing operations, the Permittee shall use HVLP spray guns ~~from paint booths B48-1 through B48-5~~ and shall comply with the conditions provided in Section D.1 of this permit.

#### D.3.9 HAP Emissions (HAP)

- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Models for Open Molding of Composites", Composites Fabricators Association, ~~April, 1999~~ **July, 2001**.

### Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-17375-00087. The operation of this proposed

modification shall be subject to the conditions of the proposed Part 70 Minor Permit Modification No. 039-17437-00087.

**Appendix A: Emissions Calculations**  
**VOC, HAP, and Particulate Emissions from**  
**From Surface Coating Operations Performed in Booths B48-1 to B48-8 and SB42-1 to SB42-3**

**Company Name: Monaco Coach Corporation**  
**Address City IN Zip: 1205 East Lincoln Street, Nappanee, Indiana 46550**  
**MSM/MPM: 039-17375/039-17437**  
**Plt ID: 039-00087**  
**Reviewer: ERG/AAB**  
**Date: May 2,2003**

Material	Density (Lb/Gal)	Weight % VOC	Weight % HAP	Weight % Solids	Usage (lbs/year)*	Estimated VOC Emissions (tons/yr)	Estimated HAP Emissions (tons/yr)	Estimated PM Emissions (tons/yr)
<b>Sealers/Topcoats</b>								
Valtec WW Sealer	7.5	75.20%	25.1%	24.8%	47000	17.7	5.9	5.8
Valtec WW LAC-40	7.7	73.80%	10.4%	26.2%	360000	132.8	18.7	47.1
<b>Stains</b>								
ST-1044 Windsor Cherry	6.6	91.00%	0.0%	3.2%	14000	6.4	0.0	0.22
Frost Maple	7.6	84.00%	0.0%	16.0%	10000	4.2	0.0	0.80
LP-500 Dash Grey Lacquer Paint	7.8	70.60%	3.0%	29.4%	15000	5.3	0.2	2.2
ST-1043 Spiced Walnut	6.7	86.80%	0.0%	4.3%	2000	0.9	0.0	0.043
ST-1290 New Dynasty Haze	6.8	89.20%	0.0%	2.8%	35000	15.6	0.0	0.49
ST-10503 New Regal Cherry	6.7	94.70%	0.0%	5.3%	20000	9.5	0.0	0.53
ST-1478 New Autumn Haze	6.7	95.20%	0.0%	4.8%	56000	26.7	0.0	1.36
<b>Solvents/Thinners</b>								
Solvent Blend	6.5	100.00%	0.0%	0.0%	25000	12.5	0.0	0.0
Stain Thinner	6.5	100.00%	0.0%	0.0%	5600	2.8	0.0	0.0
Isopropyl Alcohol	6.5	100.00%	0.0%	0.0%	2000	1.0	0.0	0.0
Acetone	6.6	100.00%	0.0%	0.0%	160	0.080	0.0	0.0
Exxate 600	7.3	100.00%	0.0%	0.0%	580	0.29	0.0	0.0
<b>Aerosol Coatings</b>								
Finishers Choice Lacquer	6.6	78.80%	0.0%	21.2%	80	0.032	0.0	0.0
Top Cote Aerosol	5.5	75.00%	0.0%	25.0%	224	0.084	0.0	0.0
<b>Spray Booth Coatings</b>								
Spray Booth Coating A7785A	8.8	95.00%	0.0%	5.0%	1600	0.76	0.0	0.0
Totals for all Booths						235.8	24.8	58.6
<b>Booth SB42-3 Estimated Actual Emissions</b>						21.4	2.3	5.3
<b>Booth SB42-3 PTE</b>						75.1	7.9	18.7

\* Estimated Actual Usage per year based on 2500 hours of operation.

After Controls = 0.93

**METHODOLOGY**

Estimated Actual Emissions Tons per Year = Wt % Pollutant \* Amount of Material Applied (lbs/yr) \* (1 ton/2000 lbs)